

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS.

Civil Action No: 3:19-cv-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC D/B/A
CENTURION PROFESSIONALS,
MANAGEMENT & TRAINING CORPORATION,
JESSE WILLIAMS, INDIVIDUALLY AND
JOHN DOES 1-9

DEFENDANTS

**MOTION FOR SUMMARY JUDGMENT OF MANAGEMENT &
TRAINING CORPORATION AND JESSE WILLIAMS, INDIVIDUALLY**

COME NOW Management & Training Corporation (“MTC”) and Jesse Williams (“Williams”), two of the defendants herein, by and through counsel, and submit their Motion for Summary Judgment, as follows:

1. The plaintiff claims that MTC and Williams intentionally acted, either on their own or in concert with her employer, MHM Health Professionals, to cause her to be terminated.
2. As is explained in their accompanying Memorandum Brief, MTC and Williams had a valid right to revoke the plaintiff’s gate clearance at the Marshall County Correctional Facility and are not liable to the plaintiff under any of the Counts asserted against them in the Third Amended Complaint.

WHEREFORE, PREMISES CONSIDERED, MTC and Williams respectfully request that the Court grant their Motion for Summary Judgment and dismiss all claims against them with prejudice.

THIS, the 26th day of October, 2020.

Respectfully submitted,

MANAGEMENT & TRAINING CORPORATION
AND JESSE WILLIAMS

BY: /s/Timothy M. Peeples
OF COUNSEL

TIMOTHY M. PEEPLES - BAR NO. 100103

tpeeples@danielcoker.com

J. CAROLINE JOHNSON - MS BAR NO. 105674

[cajohnson@danielcoker.com](mailto:cjohnson@danielcoker.com)

DANIEL COKER HORTON & BELL, P.A.

265 NORTH LAMAR BLVD., SUITE R

P.O. BOX 1396

OXFORD, MISSISSIPPI 38655

(662) 232-8979 TELEPHONE

(662) 232-8940 FACSIMILE

CERTIFICATE OF SERVICE

I hereby certify that I mailed and/or emailed a true and correct copy of the above foregoing document to the following counsel of record:

R. Shane McLaughlin, Esq.
McLaughlin Law Firm
338 North Spring St., Suite 2
PO Box 200
Tupelo, MS 38802

Rachel Pierce Waide, Esq.
Waide and Associates, P.A.
PO Box 1357
Tupelo, MS 38802

Elizabeth Hadley, Esq.
David W. Long-Daniels, Esq.
Greenberg Traurig, LLP
300 West 6th Street
Suite 2050
Austin, TX 78701

/s/Timothy M. Peeples
TIMOTHY M. PEEPLES